

Addendum A

<u>ORGANIZATION</u>	<u>DESCRIPTION AND PURPOSE</u>
1199SEIU United Healthcare Workers East	We are a labor union representing over 200,000 healthcare workers and retirees in New York City, the majority of whom are Black and Latino and live in the neighborhoods most impacted by the unconstitutional policing practices described in the lawsuit.
32BJ Service Employees International Union (SEIU)	Local 32BJ SEIU is a labor union that represents 166,000 property service workers in eleven states and the District of Columbia, including janitors, security officers, school custodians, food service workers, residential workers and window cleaners. 32BJ's members work in commercial office buildings, apartment buildings, including New York City Housing Authority buildings, government offices, airports, shopping malls, public schools, colleges, and universities, stadiums, theaters, museums, and country clubs. Approximately 85,000 of our members, many of whom are Black and Latino, work and live in New York City. Thousands of 32BJ members and their families stand to benefit from remedies ordered by the Court, which can help put an end to the humiliation and abuse of being stopped and frisked or subjected to unconstitutional trespass enforcement without reasonable suspicion that they have committed any wrong doing.
Advocacy Institute	The Advocacy Institute is committed to supporting the legislative advocacy of social justice and movement-building organizations in New York City and State.
Ali Forney Center	The Ali Forney Center is an organization which provides housing and supportive services to homeless LGBTQ youths. The Ali Forney Center supports the remedies sought by Floyd because our clients, who are overwhelmingly youth of color and LGBTQ, are disproportionately subjected to aggressive policing.
Alliance for Education Justice	National alliance of youth of color leading a movement to end the war on youth in our schools & waging struggle for education as liberation. The Alliance for Education Justice is deeply invested in ensuring an end to discriminatory and unconstitutional policing. #EndWarOnYouth
Alliance for Quality Education	The Alliance for Quality Education is a coalition of community organizing groups, mobilizing parents and community members across New York to ensure that Black, Brown and low income students have the right to a high quality education. We believe that educational justice is racial justice. This case is important to our organization because we want to ensure that parents and students are able to hold local law enforcement officers accountable to the communities they are meant to serve and protect.

Arab-American Family Support Center, Inc.	The Arab-American Family Support Center (AAFSC) empowers new immigrants with the tools they need to successfully acclimate to the world around them and become active participants in their communities. AAFSC cares about the remedies outlined as we believe all communities should be able to enjoy the same freedoms, sense of safety and belonging within the context of a fair and just society.
Astraea Lesbian Foundation for Justice	Astraea Lesbian Foundation for Justice is feminist social justice foundation focused on advancing LGBTQI human rights in the United States and around the globe. Within our U.S. program in particular, Astraea partners with organizations that are working for racial justice, immigrant rights and against the criminalization of LGBTQI people and people of color. In coalition with CPR we seek to intervene and interrupt on abusive broken windows policing and to ask for the accountability of the NYPD. We want to also bring critical awareness around the use of police brutality on poor, LGBTQ, People of Color, people with disabilities and marginalized communities.
Audre Lorde Project	The Audre Lorde Project (ALP) is a Lesbian, Gay, Bisexual, Two Spirit, Trans and Gender Non-Conforming (LGBTSTGNC) People of Color (POC) center for community organizing, focusing on the NYC area. Through mobilization, education and capacity building, we work for community wellness, and progressive social and economic justice. We are a 5,000 plus member led organization for LGBTSTGNC POC. ALP, since its inception, holds a long legacy of organizing against policing and communal violence, and for community led safety strategies to intervene on state, communal and interpersonal violence and trauma. We support any community led models of accountability that seek to end racial profiling and abusive policing. We know that policing and displacement of our communities has increased with the gentrification and privatization of New York City, and targets our communities. We support the remedies CPR has requested in Floyd to intervene and to respond to these discriminatory practices under the false guise of safety.
Brandworkers	Brandworkers is a non-profit membership organization led and operated by immigrant workers of color employed in New York City's local food manufacturing industry. Brandworkers members and their families seek to live a life free of racially motivated policing.
Bronx Freedom Fund	Since 2007, the Bronx Freedom Fund has posted bail for thousands of New Yorkers who would otherwise be incarcerated for their poverty. Every day, we bear witness to the fact that the injustices of our bail system begin even earlier, with policing practices that criminalize race and poverty and disproportionately impact communities like ours in the South Bronx and Queens. At the Bronx Freedom Fund, we strongly support remedies that foster transparency and accountability for the communities of color most impacted by these unconstitutional practices.

Brooklyn Anti-Gentrification Network	The Brooklyn Anti-gentrification Network (BAN) is a Brooklyn-wide coalition comprised of 16 member organization and hundreds of activists working to end the rampant gentrification and displacement of low to middle income residents of Brooklyn, New York. BAN is a project of Equality for Flatbush. The Brooklyn Anti-gentrification Network (BAN) signed on to the amicus brief because there is a direct correlation between gentrification and “Broken Windows” policing exemplified by the increase in NYPD stop and frisk / “Broken Windows” summons in rapidly gentrifying neighborhoods.
Brooklyn Movement Center	Brooklyn Movement Center (BMC) is a Black-led, membership-based organization of primarily low-to-moderate income Central Brooklyn residents. BMC supports the work of ending stop & frisk and other discriminatory policing practices that disproportionately target our constituency.
Brotherhood/SisterSol	Founded in 1995, The Brotherhood/SisterSol is a comprehensive youth development and leadership organization that provides direct service, trains the field on our model, and organizes around issues of criminal justice and policing reform, educational access and opportunity and environmental justice.
CAAAV Organizing Asian Communities	CAAAV builds the grassroots of working-class Asian immigrants for racial, gender, and economic justice towards systemic and institutional change. CAAAV works with youth citywide and low-income rent-stabilized immigrant tenants in Chinatown and Bangladeshi, Korean and Chinese public housing residents in Queensbridge Houses. Our organization supports this amicus brief because we have always fought for transparency from our government and those who serve it. Our communities, though not impacted in the same ways as Black and Latino communities, have had incidents of unjust harassment by the police and believe that the Floyd case will be critical to ensuring the safety of all of our communities.
Center for Law and Social Justice at Medgar Evers College, at The City University of New York	CLSJ is a community-based legal organization that specializes in addressing racial justice issues and provides quality legal advocacy, community education, trainings, and research services to communities of African descent and the disenfranchised throughout New York City. CLSJ was founded in response to the racial terror and violence that characterized policing in Black and Brown communities during the early 1980s. CLSJ supports the remedies called for in Floyd because, in 2018, more than 30 years later, Black and Brown communities continue to be plagued with policing that is largely characterized by violent racial terrorism and inequities. These remedies represent just a starting point for the true reforms that are necessary to eliminate the impact of structural white supremacy in policing.

Citizen Action of New York, Inc.	<p>Citizen Action of New York (“Citizen Action”) is a non-profit, grassroots membership organization that advocates for social, racial, economic and environmental justice with tens of thousands of members and supporters throughout New York State. Citizen Action has chapters or affiliates in eight regions of New York State, including in New York City. We have numerous members or supporters who, due to their race and residence in New York City, were and are directly impacted by the practices described in this lawsuit. Further, among the largest concerns of our organization and its supporters, reflected in our advocacy work, is the right of people of color not to be subject to discriminatory and unconstitutional policing practices.</p>
<u>ColorOfChange.org</u>	<p>With more than 900,000 members,ColorOfChange.org is the nation’s largest online civil rights organization. Discriminatory policing and police brutality continue to unjustly impact black and brown New Yorkers on a daily basis. The stop-and-frisk reforms recommended by CPR will help finally curb more than a decade of suspicionless stop-and-frisk, and will provide critical protections against police discrimination, abuse and unprofessional behavior for nearly 44,000 ColorOfChange.org members living in New York City.</p>
Community Service Society of New York	<p>For 175 years the Community Service Society of New York (“CSS”) has led the fight against poverty in New York City. This work necessarily includes addressing mass imprisonment and the challenges of reentry. CSS litigates on behalf of individuals and groups who suffer labor market discrimination because of their conviction histories, and its Next Door Project provides direct “rap sheet” related services for more than 700 people per year, in the process tackling conviction-based barriers to employment, housing and civic participation. CSS’s reentry work gives it insight into how the impacts of policing decisions persist far beyond an initial encounter, and affect not only an individual’s economic prospects, housing options, and educational opportunities, but also the futures of their families and communities.</p>
Community Voices Heard	<p>Community Voices Heard (CVH) is a member-led, multi-racial organization principally comprised of women of color and low-income families in New York State. CVH tackles tough issues and builds power to secure racial, social and economic justice for all New Yorkers. Through grassroots organizing, leadership development, policy changes, and creating new models of direct democracy CVH is creating a truly equitable New York State. Constituencies represented by Community Voices Heard have been and continue to be subject to over-policing, including unconstitutional stops, frisks, searches and trespass enforcement in our streets, public housing and private buildings - remedies that centralize these most-impacted communities and meaningfully address issues of discipline, accountability and transparency of the NYPD are crucial to our communities.</p>

Creating Law Enforcement Accountability and Responsibility (CLEAR) Project at CUNY School of Law	Cross-clinical project at CUNY School of Law which addresses the needs of communities in the New York City area targeted by national security law enforcement policy. Giving New Yorkers real-time information about their rights and the officers they interact with is key to righting the systemic wrongs identified by the Court. Establishing accountability mechanisms grounded in directly-impacted communities is a key way to ensure compliance.
Defending Rights & Dissent	Defending Rights & Dissent is an advocacy and education organization with 30,000 supporters across the country, working to fulfill the promise of the Bill of Rights for everyone. As an organization deeply concerned about the unequal application of rights, remedying racial profiling would be an important step to making the promise of the Bill of Rights a reality.
Drug Policy Alliance	The Drug Policy Alliance (“DPA”) leads the nation in promoting drug policies that are grounded in science, compassion, health, and human rights. The Alliance is a non-profit, non-partisan organization with more than 30,000 members and active supporters nationwide. DPA actively participates in the legal and legislative process and seeks to roll back the excesses of the drug war, including unlawful detention and search, and promote sensible drug policy reforms. Meaningful reform of policing practices in New York will help to protect the constitutional rights of all New Yorkers, regardless of immigration status, sexual orientation, age, mental health, or other vulnerable characteristics.
Desis Rising Up & Moving (DRUM)	DRUM was founded in 2000 to build the power of South Asian low wage immigrant workers, youth, and families in New York City to win economic and educational justice, and civil and immigrant rights. The experiences and voices of those most impacted by police abuse is rarely taken into consideration when it comes to police accountability, and the remedies requested by CPR in this brief that DRUM signs onto in would give impacted communities in Floyd, Davis & Ligon that opportunity.
East Harlem Committee for Good Government	Bringing transparency to Central and East Harlem. Having an independent community board will make sure that each officer that is committing unlawful acts to be held accountable for their actions. This will help repair our communities and gain back the public trust that has been taken away from unlawful police officers.
El Puente	El Puente is a nationally recognized human rights institution that inspires and nurtures leadership for peace and justice by promoting holistic community/youth development through engagement in the arts, education, public health, environmental advocacy and social justice. Grounded in a holistic approach to leadership development for youth and their families, El Puente bridges the worlds of health , education and the arts with activism and community empowerment.

Equality for Flatbush	Equality for Flatbush (E4F) is anti-gentrification/police accountability group in Brooklyn, NY. E4F is concerned about the increasing amount of NYPD harassment including stop and frisk searches and traffic stops occurring in Brooklyn.
Faith In New York	Faith in New York is an interfaith federation of over 70 congregations representing 80,000 families in Brooklyn, Queens, Manhattan and the Bronx that develops grassroots faith leaders to create strategies to solve community issues. FiNY cares about the Floyd remedies because all people deserve to live in dignified and safe communities free from abuse and fear inflicted by NYPD.
FIERCE	FIERCE is a youth-led organization for LGBTQ youth of color organizing to fight against police brutality, gentrification, and access to public space. Too often cases like Floyd v. City of New York fade away after its initial buzz – that’s how the city wins because people forget about it and stop fighting. We believe the NYPD should be held accountable for their misconduct and abuse of power against the people they are supposed to protect.
GAPIMNY—Empowering Queer & Trans Asian Pacific Islanders	Founded in 1990, GAPIMNY is an all-volunteer, membership-based community organization with the mission to empower queer and trans Asian Pacific Islanders to create positive change. We provide a range of political, social, educational, and cultural programming and work in coalition with other community organizations to educate and promote dialogue on issues of race, sexuality, gender, and health. GAPIMNY, an organization that’s been fighting discrimination alongside other community groups since its founding in 1990, believes that all discriminatory and abusive policing practices are detrimentally harmful, must end, and community-led accountability measures should be put in place at the NYPD.
Girls for Gender Equity	Girls for Gender Equity (GGE) is an intergenerational organization committed to the physical, psychological, social, and economic development of girls and women. GGE serves hundreds of young people across New York City, in particular girls of color and gender non-conforming young people of color between the ages of 12-24, who work to end experiences of gender-based violence and school pushout. Young people are directly impacted by frequent and patterned interactions with the New York Police Department inside and outside of school, inclusive of unconstitutional stops and searches which are often characterized as a level 1 or 2 stop. These interactions are often dehumanizing with some interactions including gender-based harassment, sexual harassment, and other forms of gender-based discrimination. GGE respectfully supports the five reforms listed in CPR’s amicus, which are informed by directly impacted communities across New York City because they are crucial to the dignity of the young people GGE serves.

Global Action Project	Global Action Project cultivates and trains youth from low-income, new immigrant, TGNC (trans and gender non-conforming) and LGBQ (Lesbian, Gay, Bisexual and Queer) communities to grow their leadership, make media and tell innovative stories that promote and amplify movements for social justice. We provide immersive programming to 125-150 youth annually, and reach live audiences of over 2,000 through workshops and screenings of our work. The majority of youth that we work with continue to report that they (and/or their peers and communities) continue to be stopped and searched by NYPD. It is critical that NYC take swift action to create transparency and accountability in relation the NYPD's stops of NYC residents.
Hetrick-Martin Institute	Hetrick-Martin Institute (HMI) is a leading professional provider of social support and programming for lesbian, gay, bisexual, transgender or questioning (LGBTQ) youth. HMI youth are ages 13 to 24, from 300+ zip codes throughout New York City area. The young people we serve are all members of marginalized communities, including 92% who are youth of color. This population finds itself at the intersection of racial and economic experiences that are statistically most likely to be subjected to tactics such as Stop & Frisk. Such experiences negatively impact the wellbeing of the youth we serve and their ability to succeed in our society.
Immigrant Defense Project	Immigrant Defense Project (IDP) is a non-profit legal resources, training and advocacy center that works to minimize the harsh and disproportionate immigration consequences of contact with the criminal justice system, and to promote fundamental fairness and due process for all immigrants accused of or convicted of crimes. Our work includes educating and advising immigrants, their criminal defenders, and other advocates in New York and nationally on issues involving the intersection of immigration and criminal law enforcement. Contact with the police and with the criminal justice system places immigrant community members at heightened risk of detention and deportation by U.S. Immigration and Customs Enforcement (ICE).
Jewish Voices for Peace-NYC	Jewish Voice for Peace is a national, grassroots organization with a large NYC chapter inspired by Jewish tradition to work for a just and lasting peace according to principles of human rights, equality and international law for all the people of Israel and Palestine. JVP has over 200,000 online supporters, over 70 chapters, a youth wing, a Rabbinic Council, an Artist Council, an Academic Advisory Council, and an Advisory Board made up of leading U.S. intellectuals and artists. Policing in New York City continues to result in consistent discrimination and abuse for people of color, immigrants, poor folks, people with disabilities, and queer & trans communities. As an organization committed to human rights from NYC to Israel/Palestine, we are invested in the remedies of Floyd as a critical step towards accountability for those whose rights are consistently threatened.

Jews for Racial & Economic Justice	For 27 years, Jews For Racial & Economic Justice (JFREJ) is a grassroots led organization that has pursued racial and economic justice in New York City by advancing systemic changes that result in concrete improvements in people's everyday lives. We believe in being led by those most directly targeted by oppression and have a growing membership base of over 2000 people as well as a working with many partner organizations that fight for justice in New York and beyond. JFREJ is invested in the remedies in Floyd because we believe that all New Yorkers have the right to live in dignity and without fear of police violence.
Jim Owles Liberal Democratic Club	The Jim Owles Liberal Democratic Club, named for the legendary gay rights pioneer Jim Owles, was formed in 2004 as a citywide political activist club with a mission to secure human rights, dignity, and freedom for all people. We believe that the lesbian, gay, bisexual and transgender community can no longer support candidates who are not willing to recognize our basic rights and freedoms. We support the remedies requested in this brief, particularly as it impacts many members of the LGBTQ community.
Justice Committee	The Justice Committee is a grassroots organization dedicated to building a movement against police violence and systemic racism in New York City. Our membership is made up of New Yorkers of color who are impacted by discriminatory, abusive policing, including family members of those killed by the police. Approximately 34% are Black/Caribbean/Afro-Latino/a, 50% are Latino/a, and 16% are Asian, with some members identifying with more than one category. We have 115 members and a supporter base of approximately 1200. Many Justice Committee members and constituents are regularly subjected to unjust stops and other discriminatory NYPD practices. These incidents sometimes escalate to harassment, brutality, and even homicide, and cause fear and extreme distrust of the police.
JustLeadershipUSA	JLUSA is a national organization committed to cutting the U.S. correctional population in half by 2030. Our constituency is made up of formerly & currently incarcerated people and justice impacted communities. JLUSA recognizes that, in order to end mass incarceration and transform the justice system, we must address how the racially biased over-policing of disenfranchised communities leads to unnecessary and harmful interactions with law enforcement and contributes to high rates of incarceration.
Kairos Center for Rights, Religions, and Human Rights at Union Theological Seminary	The Kairos Center seeks to learn from, strengthen, and expand transformative movements for social change. The Kairos Center is a key organizational leader for the Poor People's Campaign, which has thousands of members in over 40 states across the country. NYPD's stop-and-frisk policies continue to fuel the racialized criminalization of our city's poor communities. This is immoral and against our deepest religious and constitutional values.

Katal Center for Health, Equity & Justice	<p>The Katal Center for Health, Equity, and Justice is a state-based organization, strategy hub, and collaborative partner with a mission to advance practical and transformative reforms to systems, policies, and processes to strengthen health, equity and justice for all. Katal is focused on three big, inter-related goals: 1) Ending mass criminalization, mass incarceration, and the war on drugs; 2) Advancing health, equity, and justice in public safety and drug control; and 3) Building leadership and organizing capacity among local leaders, advocates, and community groups to effectively work for social change. The Katal Center for Health, Equity, and Justice joins in the call for the full implementation of the 5 CPR top-line recommended reforms in Floyd. Black and Brown communities have been plagued by discriminatory police practices for far too long, and the time to rectify the harms caused by racist stop and frisk policies is now.</p>
Latino Commission on AIDS	<p>In response to the critical, unmet need for HIV prevention and care for Latinos, a coalition of Latino leaders founded the agency in 1990. The Commission realizes its mission by spearheading health advocacy for Latinos, promoting HIV education, developing model prevention programs for high-risk communities, and by building capacity in community organizations. The Latino Commission on AIDS believes that all New Yorkers deserve to be treated with dignity and respect in their interactions with police officers. Accountability, transparency and community input are central to ensuring an end to discriminatory and unconstitutional policing.</p>
Law@theMargins	<p>Law@theMargins is a nonprofit law and media organization. We use media as a dynamic platform from which to highlight the ways our laws and legal institutions expands or limits the rights and social justice aspirations of people and communities. Law@theMargins is deeply invested in the remedies in Floyd because we believe that no New Yorker should be subject to unconstitutional policing. As an media oriented organization committed to providing the public information on our legal system, the remedies proposed by CPR will go a long way to address unconstitutional stop-and-frisk and trespass enforcement practices and increase public awareness of their rights.</p>

LGBT Faith Leaders of African Descent (FLoAD)	<p>LGBT Faith Leaders of African Descent is a 501(c)3 organization of lesbian, gay, bisexual, transgender (LGBT), and same gender loving people of African Descent and their allies formed to serve as ambassadors and educators to oppose discrimination, exclusion or intimidation of LGBT persons in our society and particularly in our church communities. We support the remedies outlined in this brief as necessary to ensure that the constitutional rights of New Yorkers, particularly LGBT New Yorkers, are respected by the NYPD. LGBT youth of African Descent are the one of the highest populations of homeless in the city of New York. These youth and other constituents of the LGBT community of color are an often forgotten population subject to the ongoing stop-and-frisk policies and as such have little voice in the legal system, social services, or advocacy services availed to other communities and are unfairly and disproportionately at risk.</p>
Make the Road New York	<p>Make The Road New York builds the power of immigrant and working class communities to achieve dignity and justice. Through community organizing we build grassroots campaigns to transform institutions and policies to reflect the values and principles of our members and communities and provide legal and survival services to ensure people in our communities are able to support their families and thrive under oppressive systems. Our membership comes from low-income communities of color across New York City who have had to navigate discriminatory policing practices and policies that can disrupt and upend their lives.</p>
Malcolm X Grassroots Movement	<p>The Malcolm X Grassroots Movement (MXGM) is a national Human rights organization promoting self-determination and empowerment for communities of African ancestry. Our NY Chapter has over 100 members from a variety of neighborhoods and communities throughout NYC. Since our founding in 1995, MXGM has consistently worked to defend our communities from all forms of discriminatory policing. We continue to our work to establish community oversight over the NYPD as we recognize that to be fundamental in preventing discriminatory policing.</p>
MCN (formerly Muslim Community Network)	<p>MCN is dedicated to using civic education and leadership development to shape the public narrative about what it means to be Muslim in America. MCN is a leader in youth development where we work with students of every ethnic and racial background where some of our young men or their family members have been victims of Stop and Frisk. As an organization, we remain committed to ensuring our young people are treated with respect and dignity in their communities. The only way to achieve this is through community engagement that gives voice to the very impacted communities.</p>

Metropolitan Community Church of New York	Metropolitan Community Church of New York is a church founded in the belief that the love of God is for all the people of God and has since its founding, had a particular ministry to the LGBTQI community and other marginalized groups. We serve a congregation of 500 members from diverse backgrounds who identify as LGBTQI. Stop-and-frisk policies criminalize particular populations based on preconceived notions and stereotypes and are an affront to our basic belief of human equality.
Metropolitan Council on Housing	The Metropolitan Council on Housing is a tenants' rights membership organization made up of New York City tenants who believe in our motto of "housing for people, not profit." We formed over 58 years ago to fight for a city where everyone has access to safe, decent, affordable housing. We organize tenants to stand up not only for their individual rights, but also for changes to our housing policies. We serve the one million NYC households who are rent stabilized or regulated, particularly those who most vulnerable to displacement – working class and low-income New Yorkers.
Micah Institution at the Interfaith Center of New York	The Micah Institute educates and equips faith leaders to end poverty and injustice. We are a racially diverse interfaith membership organization with 100 individual members and 15 institutional members. We care about the remedies in Floyd because there is still a lot to be desired from the NYPD concerning both accountability and transparency. Now is the time for the NYPD to end stop-and-frisk and "broken windows" policing, and implement community policing with moral accountability and true transparency.
Million Hoodies	Million Hoodies is a human rights membership, chapter-based organization building next generation leaders to end anti-black racism and systemic violence. We believe that elements of our identity -- whether we are of low-income, LGBTQ, living with a mental illness, experiencing homelessness, living with a disability, undocumented, and /or the resident of a particular neighborhood -- should not increase our likelihood of being stopped and searched by police.
MinKwon Center for Community Action	The MinKwon Center for Community Action, Inc., is a nonprofit community organization providing social services to and advocating for the Korean American, Asian American, and immigrant communities of New York. Immigrant communities can often be wary of law enforcement, and it is essential to public safety for the New York Police Department to build trust by treating communities of color fairly and without prejudice.

MomsRising	<p>MomsRising is an organization of more than a million people who are working to achieve safe communities, health equity, and economic security for all moms, women, and families in every state in the country. MomsRising is working to dismantle the school-to-prison pipeline, end mass incarceration, for paid family leave, earned sick days, affordable childcare, and for an end to the wage and hiring discrimination which penalizes so many mothers. MomsRising also advocates for better childhood nutrition, health care for all, toxic-free environments, breastfeeding rights so that all children can have a healthy start, and national and state budgets that reflects the contributions of women and moms.</p>
MPower	<p>MPower Change, a project of NEO Philanthropy, Inc., is the nation's largest Muslim-led grassroots organization—representing over 200,000 members—with a mission focused on building social, spiritual, racial, and economic justice for all people. As a grassroots organization representing Muslim communities across New York who are often disproportionately subject to the NYPD's policing tactics, MPower Change is deeply committed to ensuring that the NYPD implements crucial reforms to limit the impact on our communities from its previous and ongoing policies and practices.</p>
Muslim Anti-Racism Collaborative (MuslimARC)	<p>MuslimARC creates spaces for learning and developing racial justice, connects people across multi-ethnic networks, and cultivates solutions for racial equity. MuslimARC is committed to cultivating solutions for racial equity. This case highlights decades years of work carried out to ensure we can live in world that values justice and safety for all of us.</p>
NAACP New York State Conference	<p>Founded in New York City in 1909, the NAACP is the nation's oldest and largest civil rights organization. Its members throughout the United States and the world are premier advocates for civil rights in their communities. The New York State Conference of the NAACP advocates tirelessly for the educational, social, political, and economic equality of all New York citizens and to rid the state of racial discrimination. Members of the New York State Conference of the NAACP and other people of color are subject to discriminatory profiling by the NYPD without suspicion of any wrongdoing on a daily basis, simply because of their perceived or actual race, ethnicity, nationality, religion or other personal and immutable characteristics. Any efforts to delay the dismantling of the stop-and-frisk policy and restoration of constitutionally permissible policing within New York City should not be allowed.</p>

National Domestic Workers Alliance	<p>The National Domestic Workers Alliance is the nation’s leading voice for dignity and fairness for the millions of domestic workers in the United States, most of whom are women. Founded in 2007, NDWA works for the respect, recognition, and inclusion in labor protections for domestic workers. The national alliance is powered by over 60 affiliate organizations—plus robust local chapters in Atlanta, Durham, and New York—of over 70,000 nannies, housekeepers, and caregivers for the elderly in 36 cities and 17 states. As an organization building a movement rooted in the human rights and dignity of domestic workers, immigrants, women and their families - NDWA supports the necessary reforms discussed in this brief, which center the experiences of directly-impacted New Yorkers.</p>
National LGBTQ Task Force	<p>Since 1973, the National LGBTQ Task Force has worked to build power, take action, and create change to achieve freedom and justice for (LGBTQ) people and their families. As a progressive social justice organization, the Task Force works toward a society that values and respects the diversity of human expression and identity and achieves equity for all. Because LGBTQ and gender non-conforming people, especially LGBTQ/GNC people of color, are more likely to be involved in the criminal legal system and are often profiled on the basis of sexual orientation and gender identity in addition to other demographic factors like race, ethnicity and class, legal efforts to address stop-and-frisk policies are a critical piece of our broader efforts to reform the criminal legal system.</p>
New Kings Democrats	<p>New Kings Democrats is a Kings County based Democratic political reform club founded in 2008, with approximately 400 members. New Kings Democrats believes that the New York Police Department should be accountable to the communities it serves and that the tools of accountability should be placed in the hands of the community.</p>
NYC Environmental Justice Alliance	<p>Founded in 1991, the New York City Environmental Justice Alliance (NYC-EJA) citywide membership network linking grassroots organizations from low-income neighborhoods and communities of color in their struggle for environmental justice. Constituencies represented by the NYC Environmental Justice Alliance live at the crossroads of frontline communities fighting environmental injustice and over-policing, including unconstitutional stops, frisks, searches and trespass enforcement in our streets, public housing and private buildings - remedies that centralize these most-impacted communities and meaningfully address issues of discipline, accountability and transparency of the NYPD are crucial to our communities.</p>
New York City Gay and Lesbian Anti-Violence Project	<p>New York City Gay and Lesbian Anti-Violence Project (AVP) envisions a word in which all lesbian, gay, bisexual, transgender queer and HIV-affected people are safe, respected, and live free from violence. AVP empowers lesbian, gay, bisexual, transgender, queer, and HIV-affected communities and allies to end all forms of violence through organizing and education, and supports survivors through counseling and advocacy.</p>

New York Communities for Change	<p>New York Communities for Change (NYCC) is a member based, multi-racial organization that organizes in communities of color to fight against racial and economic oppression. NYCC, is composed of 20,000 members in New York City and Long Island, predominantly low-income African Americans and Latinx New Yorkers. NYCC cares deeply about the remedies in Floyd stop-and-frisk litigation that declared the NYPD's stop-and-frisk program to be unconstitutional in 2013, as most of our members and their families faced the brunt of NYPD's stop-and-frisk program.</p>
New York Immigration Coalition	<p>The New York Immigration Coalition is an umbrella policy and advocacy organization for more than 200 member organizations across New York State. The NYIC's mission is to unite immigrants, members, and allies so all New Yorkers can thrive. It envisions a New York State that is stronger because all people are welcome, treated fairly, and given the chance to pursue their dreams. The NYIC pursues solutions to advance the interests of New York's diverse immigrant communities and advocate for laws, policies, and programs that lead to justice and opportunity for all immigrant groups. It further seeks to build the power of immigrants and the organizations that serve them to ensure their sustainability, improve people's lives, and strengthen New York State.</p>
New York Metro Area Postal Union	<p>New York Metro Areal Postal Union (NYMPU) is a labor union and represents approximately 5,000 employees of the United States Postal Service who belong to the Clerk, Maintenance, Motor Vehicle, and Support Services divisions in Manhattan and the Bronx. NYMPU is the largest local of the American Postal Workers Union (APWU). New York Metro Area Postal Union opposes the abusive and discriminatory the stop-and-frisk tactics of the of the New York Police Department that disproportionately impacts Black and Latino communities. ALL New Yorkers deserve to be treated with dignity and respect and have their rights protected and upheld by law enforcement, not violated.</p>

Nodutdol for Korean Community Development	<p>Nodutdol is a community of first through fourth generation Koreans living in the U.S., mostly based in New York City. We are made up of artists, teachers, students, working professionals, young families, etc. Our work takes place in the Korean community, both locally and around the world -- particularly seeking to bridge divisions created by war, nation, gender, sexual orientation, language, class, and generation among Koreans and to empower our community to address the injustices we and other people of color face here and abroad. Members of Nodutdol for Korean Community development believe that Communities United for Police Reform's latest amicus curiae statement submission is crucial to the process of bringing about better practices and comprehensive reform to policing in New York City. Unconstitutional stops and abusive policing practices by the NYPD are not only unproductive to preventing serious crimes but also bring long-term harm to communities of color, particularly those who are disproportionately targeted on a regular basis due to racial prejudice. More accountability and transparency are needed to prevent NYPD officers from causing any physical or psychological harm to community members during police encounters.</p>
Northern Manhattan Coalition for Immigrant Rights	<p>Northern Manhattan Coalition for Immigrant Rights works with over 5,000 families a year on issues such as immigration, citizenship, deportation and voter participation focusing on keeping families together, facilitating integration and building community power. Because of the increased, formal collaboration between NYPD and Immigration and Customs Enforcement (ICE), the stakes are dangerously high for an immigrant when interacting with the local police - indeed it can mean the difference between staying with your family or being permanently exiled from the US, without any due process protections. This is why, for NMCIR, the remedies in Floyd are critical.</p>
Peoples Power Assemblies	<p>Peoples Power Assemblies organize to empower workers & oppressed people to demand jobs, education & healthcare while fighting against racism, police terror, sexism & LGBT bigotry.</p>
Picture The Homeless	<p>Picture the Homeless is a city-wide, homeless grassroots organization that is led by New Yorkers who are directly impacted by biased-based policing by the NYPD. Our membership includes hundreds of homeless New Yorkers who sleep in public spaces, mass transit facilities, shelters, and in overcrowded housing conditions. The majority are African American and Latino. Picture the Homeless is concerned about the Floyd remedial process and outcomes because our members are continuously engaged with the NYPD and their quality of life directly impacted by NYPD policies and practices.</p>

Progressives Educating New Yorkers	Progressives Educating New Yorkers is a 501(c)(3) that help youth with job training in the insurance field and help them use their voice to change policies that directly affect them. When a police officer where's a badge it supposed to represent public trust and each officer should identify themselves when they are interacting with the public. How do we suppose to trust the police if they can't deliver public trust? Youth-Led. We Listen
Public Science Project	The Public Science Project (PSP) works in solidarity with communities interested in designing and implementing participatory research that investigates, speaks back to, and reimagines structural injustice. As we have seen with Eric Garner, reforming police stops in New York City is literally about life and death. We work with individuals and organizations who need the remedies of Floyd to be effective.
Red Hook Initiative	Red Hook Initiative (RHI) is a community center in Red Hook, Brooklyn that serves over 450 youth per year with in-depth programming and reaches over 5,000 residents with support or services. At RHI we believe that social change to overcome systemic inequities begins with empowered youth. In partnership with community adults, we nurture young people in Red Hook to be inspired, resilient, and healthy, and to envision themselves as co-creators of their lives, community, and society. RHI is signing on because despite the fact that the NYPD says there are no longer unconstitutional stops in NYC, in a recent study conducted by RHI, a significant majority of young adults in Red Hook, Brooklyn reported feeling harassed by the NYPD and reported that the presence of police make them feel unsafe.
Rockaway Youth Task Force	The Rockaway Youth Task Force is a member-led organization of youth of color within the Rockaway peninsula that builds power to secure social, economic and racial justice for all. We currently have 65 youth organizers who all live in Rockaway and over 100 members. We care about the remedies in Floyd because Stop and Frisk was something that affected our membership and community directly. It was traumatizing for young black and Latino men to be stopped without any cause on their way to work or home from school, in front of their house, or just walking down the street.
Showing Up for Racial Justice - NYC	SURJ NYC is a chapter of a national network organizing white people for racial justice. We are committed to moving white people into action while deepening accountable relationships with organizations and coalitions led by people of color. SURJ NYC stands for the accountability of our police and politicians to the communities most impacted by abusive policing in order to create a truly safe New York City.

South Asian Fund For Education, Scholarship & Training (SAFEST)	South Asian Fund For Education , Scholarship & Training (SAFEST) is a nonprofit community based organization in New York City. SAFEST is organized to provide services to you according to whatever you need, whenever you need. Our mission is to educate and integrate underserved newcomers that are usually South Asian Immigrants, into the civic and economic life of New York. We assist individuals and families in the area of basic education, worker's rights, voting rights, civil rights, Health care access, and also connect them to various benefits, provide senior support services, promote civic engagement and advocate for all social services.
St. Ann's Corner of Harm Reduction	St. Ann's Corner of Harm Reduction (SACHR) is a grassroots harm reduction organization that meets every participant where s/he is. SACHR assists drug users, homeless, people living with HIV/AIDS, LGBT persons, sex workers and the disabled in dealing with daily challenges of securing entitlements, adequate supply of sterile injecting equipment, getting HIV and HCV testing, relieving stress and getting a hot meal. Based on our experiences serving communities that are often vulnerable to discriminatory and abusive policing, we support CPR's 5 top-line recommendations and urge the Court to order these reforms.
Street Vendor Project, Urban Justice Center	SVP organizes and provides legal and small business support to all street vendors in New York City. The majority of SVP's members are immigrants and people of color, are subject to strict enforcement by the NYPD and other law enforcement agencies, and thus are interested in the meaningful reforms set out by this litigation.
Sylvia Rivera Law Project (SRLP)	SRLP provides services to low-income people and people of color who are trans, gender non-conforming, and intersex. We work to support people located in New York City and incarcerated throughout New York State.
T'ruah: The Rabbinical Call for Human Rights	T'ruah: The Rabbinic Call for Human Rights brings together rabbis and cantors from all streams of Judaism, together with all members of the Jewish community, to act on the Jewish imperative to respect and advance the human rights of all people. We represent more than 2,000 Jewish clergy across North America, including several hundred in the New York City area, along with thousands of Jewish lay people and activists. As Jews, we understand what it is like to be targeted by authorities not on the basis of our actions, but because of our religious background. Furthermore, we believe that every human being is created b'tzelem elohim, in the image of God. It is therefore incumbent on each of us to act in a way that affirms the fundamental dignity of every human being. Respect for each human being is the foundation of Jewish ethics. T'ruah supports the call for the full implementation of the 5 CPR top-line recommended reforms because New Yorkers have been subject to police surveillance and unjust stop and frisks solely on the basis of their race or religion, acts which disrupts community cohesion and denies their inherent human dignity. These practices are unjust and must be halted.

Tarab NYC	Tarab NYC fosters an inclusive and safe community of lesbian, gay, bisexual, trans, queer, and/or gender non-conforming Arab, Middle Eastern, and/or North African people in the greater New York City area. Our community, many of which are immigrants, is adversely impacted by abusive and invasive stop-and-frisk laws that put our safety and security in jeopardy. Tarab NYC supports the remedies proposed in CPR's <i>Floyd</i> Amicus and calls for greater transparency from law enforcement in its practices.
The Arab American Association of New York	The Arab American Association of New York is a direct services and advocacy organization that serves to protect and empower the Arab immigrant and Arab American population in New York. We offer free immigration services, ESOL courses, healthcare services, mental health services, youth mentorship programs, Voter Registration and civic engagement, as well as advocacy efforts focused on immigration reform and police reform. We serve well over 5000 people per year, 95% of them are Arab and the rest from other immigrant communities. Our community has been a victim of undue surveillance and racial profiling; AAANY supports the remedies in Floyd because it promotes police transparency and fosters trust between our communities and law enforcement, making a safer New York City for all marginalized people.
The Black Institute	The Black Institute is an action tank -- a think tank that takes action -- and addresses issues of concern to the black immigrant and African American communities. TBI has more than 4,000 members, including a team of faith leaders, minority owned businesses, and residents of New York City living in at-risk low-income communities of color. The Black Institute feels reform in the criminal justice system is needed and necessary. Black and Brown people are disproportionately targeted and handed criminal records that assist in preventing these individuals from gaining employment, housing and other resources needed to live a positive life.
The Center for Popular Democracy	The Center for Popular Democracy is a national network of community organizations working in collaboration and solidarity with our partners and allies across the country for an end to discriminatory and oppressive policies in our nation and towards strong, healthy, and thriving communities. The remedies in Floyd are critical efforts to hold to account and reform the New York City Police Department's abuses against its residents of color.

The Community Development Project at the Urban Justice Center	<p>The Community Development Project at the Urban Justice Center (“CDP”) is a not-for-profit organization that provides legal, participatory research and policy support to strengthen the work of grassroots and community-based groups in New York City to dismantle racial, economic and social oppression. Our partners take the lead in determining the priorities and goals for our work in the areas of capacity building, consumer justice, equitable neighborhoods, tenants’ rights & housing justice, immigrants’ rights, participatory research and policy, and workers’ rights. This case is of utmost importance to our organization, clients, employees, and community partners as this relates to discriminatory policing that not only affects the wellbeing of New Yorkers but has a deeply adverse impact on NYC residents’ ability to secure and maintain housing, employment, immigration status, financial stability, and general sense of community.</p>
The Gathering for Justice Inc.	<p>The Gathering for Justice is a 501C3 organization founded by Harry Belafonte in 2005 and led by Executive Director Carmen Perez. The Gathering’s mission is to end child incarceration and eliminate the racial inequities in the criminal justice system that enliven mass incarceration. Our multi-pronged approach to reforms include a robust rapid response criminal justice task force, Justice League NYC, and the soon-to-launch west coast version Justice League CA. The Gathering accomplishes their ambitious and intersectional agenda with small yet mighty human resources - 3 staff members, and the all-volunteer Justice League NYC’s members which include organizers, educators, artists and formerly incarcerated individuals, and an overwhelming majority of Black and Brown leaders. The Floyd decision directly impacts the communities we serve. It is imperative that the recommendations CPR developed through the “Joint Remedies Process” (JRP) - a thorough and substantive process that included multiple far-reaching community weigh-ins - are implemented immediately. While the city and NYPD continue to insist that bias no longer exists in policing, we feel it’s critical to have a court order these 5 recommendations in order to guarantee discipline, accountability and transparency in stops and related issues.</p>
The Majlis Ashura (Islamic Leadership Council) of New York	<p>Established in February 1989 and constituted the following year, the Majlis ash-Shura organizes with representatives of over 80 mosques and Muslim organizations - imams & board presidents, activists, youth directors, and leading women ,men , and youth of communities across the NYC metropolitan area; developing a platform of ethics, justice, and human dignity. The issue of police accountability and reform is a major one for our faith community - not only because of the past targeting of us for warrantless surveillance, but also because members of our community have been killed as the result of use of police excessive and deadly force - from Shu’aib Abdul-Latif to Amadou Diallo to Mohammed Bah, and because many accountability questions and issues impacting all New Yorkers still exist in relation to the NYPD.</p>

Theatre of the Oppressed NYC	Theatre of the Oppressed NYC partners with community members at local organizations to form theatre troupes. These troupes devise and perform plays based on their challenges confronting economic inequality, racism, and other human rights injustices, in the housing, criminal justice and immigration systems. We work with 200 community artists of color each year in all 5 boroughs and hold public forums with over 3500 New Yorkers.
Transgender Law Center	Transgender Law Center (TLC) is the largest national trans-led organization advocating self-determination for all people. Grounded in legal expertise and committed to racial justice, TLC employs a variety of community-driven strategies to keep transgender and gender nonconforming people alive, thriving, and fighting for liberation. Transgender people, particularly transgender women of color, are often profiled and targeted by the police for stop and frisk as well as unconstitutional stops and baseless arrests.
Transportation Alternatives	Formed in 1973, Transportation Alternatives' mission is to reclaim New York City's streets from the automobile and advocate for better bicycling, walking, and public transit for all New Yorkers. With 100,000 active supporters, more than 10,000 dues-paying members and a committee of activists working locally in every borough, TransAlt fights for the installation of infrastructure improvements and equitable policies that reduce speeding and traffic crashes, save lives and improve everyday transportation for all New Yorkers. Black and Brown New Yorkers are disproportionately injured and killed by motor vehicles on our city's streets and are disproportionately stopped and ticketed by the police while walking and biking. The critical key reforms suggested in this amicus brief would help ensure that the ongoing legacy of Floyd, Ligon and Daniels serves to end discriminatory and racially disparate policing and for police resources to instead focus on the dangerous driving that truly harms our communities.
Trinity Lutheran Church	Trinity Lutheran Church is in the heart of Sunset Park and addresses spiritual and social justice issues. We support the end to racial profiling found in policing policies.
UPROSE	Founded in 1966, UPROSE is Brooklyn's oldest Latino community-based organization. An intergenerational, multi-racial, nationally recognized community organization, UPROSE promotes sustainability and resiliency in Brooklyn's Sunset Park neighborhood through community organizing, education, indigenous and youth leadership development, and cultural/artistic expression. Central to our work is advocacy to ensure meaningful community engagement, participatory community planning practices, and sustainable development with justice and governmental accountability.

Voices of Community Activists and Leaders (VOCAL-NY)	Voices of Community Activists and Leaders (VOCAL-NY) is a grassroots membership organization building power among low-income people affected by HIV/AIDS, the drug war and mass incarceration to create healthy and just communities. VOCAL-NY members are low-income, people of color from across New York State, we have chapters in New York City, Albany, and Westchester and are people living with HIV/AIDS and hepatitis C, active and former drug users, and the formerly incarcerated. The Floyd verdict validated what low-income communities of color have known for too long—that New York City’s policing practices are discriminatory and abusive—and now we need reforms ordered by the Court that will help us usher in a new era of community-based solutions so that we can finally rebuild trust and accountability between community and the NYPD.
War Resisters League	War Resisters League is the oldest secular, pacifist organization in the United States. WRL works on a national scale and has a membership of approximately 15,000 people. WRL affirms that all war is a crime against humanity and strives nonviolently for the removal of all causes of war including racism, sexism, and all forms of exploitation. WRL considers ending racist policing practices to be part of this work.
We Dream in Black	We Dream In Black aims to strengthen and expand the power and voices of Black domestic workers and amplify their contributions to a healthy multiracial and economically just society for all. We Dream in Black’s membership consists of populations who are vulnerable to discriminatory policing, which includes unconstitutional stops, frisks, searches and trespass enforcement in our streets, public housing and private buildings. We support CPR’s requested remedies and uplift the need for greater transparency, accountability, and discipline when it comes to the police.
Youth Represent	Youth Represent provides holistic, community based legal representation to New York City youth age 24 and under with current or past involvement with the criminal justice system to ensure access to fundamental elements of a stable and successful life - housing, employment, education and family resiliency. Youth Represent promotes law and policy that effectuates and reinforces New York’s expressed commitment to reentry, racial justice and equality.

Addendum B

July 5, 2018

Honorable Analisa Torres
Daniel Patrick Moynihan United States Courthouse
500 Pearl Street
New York, NY 10007-1312

Dear Honorable Judge Torres:

We write to add our voices of support to the request that the court mandate the NYPD to adopt the specific reforms identified by New Yorkers most directly harmed by abusive, unconstitutional stops and trespass enforcement identified as priorities in this filing by Communities United for Police Reform (CPR). **As the surviving family members - - of New Yorkers killed by the NYPD, we know too well the experiences of being impacted by unconstitutional and abusive policing in this city.** Police killings of civilians are the most extreme example of more common abusive and too-often unconstitutional policing interactions, like abusive street stops and trespass enforcement. Many of us have long said that the unjust killings by police are allowed to happen because we as a society allow the far more common abuses going repeatedly unchecked by the police department and other public entities tasked with protecting public safety and civil rights.

The Floyd v. City of New York case and its resulting court-ordered reform process represent an unprecedented opportunity to stem abusive unconstitutional policing, and as a result reduce the harm from escalating abuses that manifest as brutality against and killings of civilians. It is critical that these issues with abusive and unconstitutional stops, frisks and trespass enforcement of civilians be meaningfully addressed – it would be an unacceptable and squandered opportunity for this process to end without putting in place substantive, lasting reforms that go beyond simply training and changing language on paper in the patrol guide and elsewhere. **Fundamental mechanisms that ensure true accountability, meaningful and timely discipline of unconstitutional and abusive policing, and transparency from the perspective of those most directly impacted by unconstitutional, abusive policing must be at the heart of any reforms that the court orders.**

We know from experience how rare it is for officers to be held accountable for abuses against civilians, since that has been the case with so many of the officers involved in killing our loved ones. It is also the case that those officers had engaged in abusive behavior previously – sometimes even abusive and unconstitutional stops – and were not meaningfully held accountable, allowing them to go on to kill our loved ones. NYPD Officer Daniel Pantaleo had engaged in an abusive pedestrian stop and an abusive vehicle stop prior to killing Eric Garner, according to substantiated civilian complaints by the NYC Civilian Complaint Review Board. Yet Officer Pantaleo faced no meaningful discipline for repeatedly engaging in such abusive behavior, and went on to kill Mr. Garner. Four years later, Pantaleo is still on the force, with annual pay increases and overtime. Then-officer Richard Haste had received a civilian complaint for an abusive frisk and other complaints before he went on to kill unarmed 18-year-old Ramarley Graham in front of his grandmother and his six-year-old brother. Those are only

two examples amongst many of the failures of the NYPD discipline system to take unconstitutional and abusive stops, frisks, searches and trespass enforcement seriously.

If officers were held accountable for engaging in abusive, unconstitutional stops in a transparent, timely and meaningful way, it would prevent officers from engaging in even worse behavior that can result in the tragic injustices our families have been forced to experience. If there is transparency about what discipline is given out for such abusive stops and that is fulfilled, it will build the trust of community members more than any so-called police-community relations effort or neighborhood policing.

It is also critical that both the department and officers be required to be transparent about all investigatory encounters with civilians. NYPD officers should be required to document lower level stops (known as Level 1 and 2) and inform those stopped of their right to freely end such encounter whenever they desire. These lower-level encounters can be the beginning or site of incidents where police officers kill civilians, as we have seen both here in New York and across the country. In the case of the killing of Eric Garner, the initial encounter was arguably such a lower level encounter. Civilians should be informed of the nature of low-level policing encounters, especially when they legally maintain the right to end such an encounter but are restricted from practically exercising that right by an officer. The lack of reporting of these encounters also creates a bad incentive for the police department to misclassify such stops at a time when the scrutiny of stops has become so high. It also provides the public with a distorted view of how communities are being impacted by policing, something that flies in the face of real transparency. Another mechanism that the court can and should mandate to increase transparency is to require that officers identify themselves and explain the reason for all investigatory encounters. Such policy exists in law for certain encounters and has been considered best practice, as was outlined by President Obama's Taskforce on 21st Century Policing, which was co-chaired by police and law enforcement officials.

Finally, we also entirely agree that the court should create an independent community board, made up of police accountability groups and community organizing groups that serve and are led by members of directly-impacted communities. This board is critical to providing the court with a more accurate, comprehensive community perspective about the implementation and effectiveness of reforms. Too often those not directly affected by public policies and practices make decisions or make an assessment of a policy's impact without truly capturing the perspective of those most impacted. This has especially been true with policing and stop-and-frisk. People detached from the day-to-day experiences of impacted communities and with a political agenda have claimed the problem has been fixed, simply pointing to NYPD self-reported data. Instead, the voice of affected New Yorkers must receive the listening and weight they deserve. In fact, communities most directly impacted by stop-and-frisk -- including many of us signing this and our families -- have frequently offered a different perspective that contrasts with that of political and public officials, who have an incentive to portray the situation quite differently. **We are asking the court to make sure that the real experiences of New Yorkers most impacted by historically abusive and unconstitutional stop-and-frisk practices guide the court in determining the status of reforms.**

New York City has the largest police department in the country, and the stakes for ensuring this court-ordered reform process is successful are high. Our communities already faced the unsuccessful reform process that derived from the preceding *Daniels v. City of New York* case after the killing of Amadou Diallo. It would be a lost opportunity and detriment to civil rights if this process succumbed to the same fate and the NYPD was not compelled to fully reform the issues at the core of the case. We must end the abusive, unconstitutional stop-and-frisks that violate people's rights and undermine public safety by perpetuating further and escalating police abuses.

We urge you to side with the amicus curiae in mandating the proposed reforms stated in this filing be implemented by the NYPD. It is critical to safeguarding the rights and safety of New Yorkers, particularly those who are Black and Latino, and ensuring the NYPD lives up to its obligation to comply with the Constitution and the rights bestowed by it.

Sincerely.

Iris Baez, mother of Anthony Baez, killed December 22, 1994 in the Bronx
Hawa Bah, mother of Mohamed Bah, killed September 26, 2012 in Manhattan
Valerie Bell, mother of Sean Bell, killed November 25, 2006 in Queens
Gwen Carr, mother of Eric Garner, killed July 17, 2014 in Staten Island
Victoria Davis, sister of Delrawn Small, killed July 4, 2016 in Brooklyn
Kadiatou Diallo, mother of Amadou Diallo, killed February 4, 1999 in Manhattan
Carol Gray, mother of Kimani Gray, killed March 9, 2013 in Brooklyn
Angie Hicks, aunt of Shantel Davis, killed June 14, 2012 in Brooklyn
Natasha Duncan, sister of Shantel Davis, killed June 14, 2012 in Brooklyn
Joyce Huang, sister of Yong Xin Huang, killed March 24, 1995 in Brooklyn
Joshua Lopez, nephew of John Collado, killed September 6, 2011 in Manhattan
Constance Malcolm, mother of Ramarley Graham, killed February 2, 2012 in the Bronx
Chie Oyamada, mother of Ryo Oyamada, killed February 21, 2013 in Queens
Tsukasa Oyamada, father of Ryo Oyamada, killed February 21, 2013 in Queens
Hertencia Peterson, aunt of Akai Gurley, killed November 20, 2014 in Brooklyn



Justice Committee

JusticeCommittee.org

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July 3, 2018

Honorable Analisa Torres
Daniel Patrick Moynihan
United States Courthouse
500 Pearl Street
New York, NY 10007-1312

RE: Remedies that should be ordered by the Court in *Floyd, Davis & Ligon* litigations

Dear Honorable Analisa Torres:

We are writing to you as an organization that has been involved in Floyd since the very beginning, and even prior to that. During the Joint Remedies Process, we engaged in every possible opportunity to ensure the voice and perspective of directly impacted New Yorkers would be heard by the court. We worked with Judge Belen on the JRP Advisory Committee, we helped ensure the focus groups happened well, we organized town halls, and we worked with our partners in CPR and beyond to analyze the results of various community input to ensure that there would be a set of remedies that could be identified that reflected what our communities need and deserve.

The Justice Committee (JC) is a grassroots organization dedicated to building a movement against police violence and systemic racism in New York City and empowering low-income Latino/as and other people of color to address these issues. Recognizing that true power can only be exercised by unified communities we prioritize developing the leadership of both youth and elders and strive to make our organizing a multi-generational effort. By building solidarity with other anti-racist, immigrant and people of color-led organizations, we seek to contribute to a broad-based movement for social justice.

When the Justice Committee was founded, we were part of the National Congress for Puerto Rican Rights. Our cofounder, the late Richie Perez¹, was a long-time activist and organizer for racial and social justice, a former Young Lord Party member, and a leader fighting racism and police brutality in the New York City and nationally. The Floyd lawsuit was able to be filed because of a lawsuit filed in 1999 (*Daniels v. City of New York*) that was organized by Richie. Richie brought the idea of the need for the lawsuit to the Center for Constitutional Rights and grassroots organizations of color after the killing of Amadou Diallo in a hail of 41 bullets by NYPD officers – the unit that killed Diallo was also the unit that was carrying out the majority of stop-and-frisk in New York City at the time, and it was infamous for racial profiling. Richie was right to push for the Daniels litigation, and we believe he is watching the Floyd litigation now to try to correct what failed in Daniels.

One of the main lessons our organization has learned in the past 19 years from Daniels to Floyd, Davis and Ligon, is that litigation alone will not bring about real or lasting change if there is not a

¹ Obituary of Richie Perez in the New York Times: <https://www.nytimes.com/2004/03/29/nyregion/richard-perez-is-dead-at-59-advocate-for-minority-rights.html>

consistent and formal mechanism for real leadership and input from the communities that are most impacted by abusive and unconstitutional policing. We also know from Daniels and Floyd that the NYPD can not be trusted to police itself – and that changes in policies, training and supposed protocols mean nothing if they are not backed up by real and fast consequences and discipline for abusive and unconstitutional actions, and that if the NYPD is allowed to hide basic information from the public, it will be able to just use public relations spin to create the mirage of change while our communities continue to face unconstitutional stops, trespass enforcement, and daily abuses and humiliations.

We support all of the requests for remedies in the CPR brief – and we know that they resonate with community members because our members and those we work with have said that these remedies are necessary. In spite of the millions of public and private dollars that the NYPD has put into public relations around its “Build the Block” and “neighborhood policing” programs, we know from the experiences of our members and their neighbors, that unconstitutional stops and trespass enforcement – and other human rights violations - are continuing.

There is no current mechanism for directly affected communities to have a real voice in saying whether we think the NYPD is in compliance with ending their unconstitutional practices. This is wrong. As the Floyd remedial order said, there is really no substitute for the expertise of directly impacted communities. If our communities don’t have a real say in the remedies or assessment of whether or not there has been substantial progress and compliance -- and it’s left just to a team of “professional experts” -- then we believe that we will need litigation again on the very same issues we have been litigating for the past 19 years. That would be a shame, a waste of resources, but also a sham. Every time a court or legislative process fails our communities, there is more damage and more human rights abuses.

Unconstitutional and abusive stops can lead to killings of New Yorkers. This isn’t hyperbole or exaggeration. We are in an era where abusive NYPD officers are more emboldened than ever to violate the constitutional rights of New Yorkers because they have seen time and time again, that there are almost never any meaningful consequences for abusive or unconstitutional behavior.

We work with the mother of Eric Garner. The officer who killed her son almost four years ago – Daniel Pantaleo – is still paid by taxpayer dollars and is still part of the NYPD. Officer Pantaleo had been found to have conducted abusive stops in the past. In fact, the first few minutes of the encounter with Eric Garner that resulted in his murder could arguably be considered a level 1 encounter that escalated to a level 4 arrest, where a chokehold that had been banned for over 20 years in the department was used to kill Eric as he said “I can’t breathe” at least eleven times.

Our cofounder Richie Perez organized alongside Iris Baez, the mother of Anthony Baez who was murdered by Francis Livoti in 1994 by the banned NYPD chokehold – 20 years before Eric Garner. Livoti was fired by the NYPD before the DOJ indicted or convicted Livoti – even as the current NYPD refuses to take any disciplinary action against Pantaleo.

Unconstitutional policing, including abusive and unconstitutional stops, frisks, searches and trespass enforcement are instances that are experienced as deeply humiliating, frightening, abusive – and in the most extreme cases, can be a matter of life and death. There are two lessons that Richie taught our organization and others that we’d like to share:

1. Killings by police are the extreme, they're the tip of the iceberg. But they are enabled by the daily humiliation and abuse that goes unchecked – the foundation of the iceberg. This is part of why there must be strong remedies related to discipline of officers and transparency of disciplinary standards and disciplinary actions. It's shameful that there has not been any meaningful disciplinary reforms recommended by the Monitor or ordered by the court in Floyd, Davis or Ligon to-date.
2. Richie also taught our organization that we must demand changes for there to be progress, and we must use any and all tactics to demand real changes that improve the daily conditions for our communities. The litigation of Floyd, Davis and Ligon is one of the tactics right now and we owe it to our communities to try to get these remedies right this time.

We respectfully urge you to deeply consider and order the 5 top-line remedies and related reforms that we are supporting in this brief.

Sincerely,

A handwritten signature in black ink, appearing to read "Loyda Colon".

Loyda Colon
Co-Director
Justice Committee

A handwritten signature in black ink, appearing to read "Yul-san Liem".

Yul-san Liem
Co-Director
Justice Committee



July 5, 2018

Honorable Annalisa Torres
Daniel Patrick Moynihan
United States Courthouse
500 Pearl Street
New York, NY 10007-1312

Joint Remedial Process in *Floyd, et al. v. City of New York, et al.*, Case No. 08-CV-1034 (AT)

Your Honor:

I am submitting this letter on behalf of the Malcolm X Grassroots Movement (MXGM), an organization I have been a member of for the past 12 years. I was also a member of the Joint Remedial Process Advisory Committee convened by Judge Ariel Belen. As a survivor of New York Police Department (NYPD) sexual harassment and on behalf of MXGM, I urge you to create a stronger New York City and order the reforms enlisted herein co-created by my community and communities represented by Communities United for Police Reform.

The Malcolm X Grassroots Movement, a national membership-based human rights and racial justice organization, is committed to promoting self-determination as a tool for community empowerment. Our programs include but are not limited to promoting food justice, ending police violence and mass incarceration, halt predatory lending and develop youth leadership. MXGM's Brooklyn Chapter works to increase health, wealth and political power in black communities throughout New York City. Ending unconstitutional stops, which often lead to the police beatings, sexual assaults and the killing of people of color, is the goal of our anti-police violence organizing. This work includes facilitating Know Your Rights, Cop Watch trainings and community conversations in community centers and educational centers across central Brooklyn. We continue to provide support to survivors of physical, mental, emotional and sexual abuse by New York City Police Department (NYPD) officers. Many of our members, like myself, have been subjected to the discriminatory and life threatening interactions with NYPD.

The Malcolm X Grassroots Movement views the Floyd litigation and the court's ruling of the NYPD's stop-and-frisk program as an unconstitutional product of unenforced remedies in *Daniels, et al. v. City of New York, et al.* Like *Daniels*, the predecessor to the Floyd litigation, Floyd shines a light on unconstitutional stops, frisks, searches and arrests by NYPD officers that result in the public humiliation and degradation of communities of color. Members of MXGM have been organizing on the issues addressed in *Floyd*, *Davis* and *Ligon* since before those lawsuits were filed. We were amongst the lead grassroots organizations in New York City that worked to ensure the filing of the *Daniels* lawsuit and our members were also part of that class.

Over the past 23 years, ending police violence has been the focus of MXGM organizing throughout New York City. We co-created and led coalitions to disband the street crimes unit that killed Amadou Diallo, which was a result of *Daniels, et al. v. City of New York, et al.*, and supported the families of those killed in central

Brooklyn and throughout New York City. For example, central Brooklyn lost 19 year old Timothy Stansbury, murdered by Officer Richard S. Neri Jr. in 2004 who was patrolling New York City Housing, and 13 year old Nicholas Heyward, Jr who was killed in the stairwell of a NYCHA building while he was simply playing. The senseless killing of these young men, who were steps away from their home, were uplifted in the Joint Remedies Process. These are two amongst many cases that laid the groundwork for *Davis v City of New York et al.*

MXGM brings history, knowledge and people power to *Daniels, et al. v. City of New York, et al.*, *Floyd, et al. v. City of New York, et al.*, and the Joint Remedies Advisory Board. A key lesson learned is that a lack of accountable, transparent enforceable remedies in *Daniels, et al. v. City of New York, et al.*, has led to skyrocketed stop and frisk rates. As a result, police have continued to murder, beat, sexually assault, and violate our community members across all ages. Therefore, as an organization represented on the Joint Remedies Process Advisory Board and involved in this fight for over 23 years, we believe it is our responsibility to correct the injustice post *Daniels, et al. v. City of New York, et al.*, and bring about enforced and community supported change. As advocates for justice and for families, we must fight to ensure the remedies enacted in *Floyd, et al. v. City of New York, et al.*, puts an end to over 20 years of lawsuits. I believe it is our duty, and in the interest of the law and the people to create infrastructure that eradicates harm and violence caused by police for those directly impacted by racist policing. Therefore, we must go beyond finding a middle ground between the parties. We must rebuild a city that ensures Black and Brown communities are included in the definition and practice of community safety.

We support the request for remedies below created by youth, parents, and residents of communities of color across New York City. These overarching remedies were pulled from a series of town halls, trainings and community conversations where time and time again our communities have expressed outrage that each police killing began as a level 1 --both investigatory and non-investigatory- stop. MXGM believes these remedies center our mission and vision of human rights and the lived realities of those directly impacted by unconstitutional, abusive and deadly policing. With our partners at Communities United for Police Reform (CPR), we want to uplift the following:

- **Zero Tolerance for Abusive Policing & Transparent Discipline:** Meaningful, timely and transparent discipline and accountability must be in place for officers and precincts/commands for unconstitutional abusive stops, and broader forms of police violence. Our constituents propose that discipline officers and precincts will face for such misconduct be made available to the public -- and that community members should have a formal and structured way to give direct feedback on officers for the purpose of officer evaluations, and on their precincts.
- **Transparency for All Stops:** Stops begin with a level 1 interaction that may increase to a level 4 (arrest). Our constituents propose that NYPD be required to record and publicly report (quarterly and annually) all level 1 and level 2 encounters, disaggregated by demographic, geographic, and precinct/command information. The NYPD should be required to report them, rather than conceal the thousands of investigatory stops that New Yorkers are experience on their way to work, school, grocery store and picking up their kids from school -- many of these encounters we believe are unconstitutional level 3 stops that are being mischaracterized as level 1 or level 2 encounters. As a result of repeated violence by NYPD, our constituents have repeatedly noted feeling concerned for the safety and not feeling able to invoke their right to walk away. Our constituents propose that officers should be required to notify people of their freedom to leave encounters that are not level 3 reasonable suspicion stops, which is permitted for level 1 and 2 stops. Officers should be required to

identify themselves, explain the reason for the encounter, and provide their pre-typed business card in all level 1 encounters, just as they are required to in other encounters. This ensures that officers are not abusing their authority and conducting unconstitutional stops, or misreporting by not recording it as a stop.

- **Independent Community Board to Assess Compliance:** Create and resource an independent community board, consisting of at least 5-7 organizations that are led by, serve, and organize directly-impacted communities and police accountability groups with a significant history of work with the Floyd/Daniels/Ligon cases. We believe that an independent and resourced community board, which was discussed during a town hall facilitated by MXGM as per the court's order in the joint remedies process, requires a community-led assessment of NYPD compliance that is based on the realities experienced by people most impacted by stop-and-frisk and trespass enforcement abuses.

We urge you to exert the court's authority and create police accountability and transparency that speaks to the needs of those directly impacted by policing in New York. This ruling is an opportunity to redefine community safety to include and respect the human rights of communities of color -- and to include the hard work of communities in the remedies process. With this ruling, the court can eliminate the fear among communities of color that when an officer approaches their life may end. This is our motivation to continue fighting.

The three core recommendations noted above and others in the CPR brief are actionable steps towards communities of color no longer having to worry about their safety or the safety of their loved ones when interacting with police. We urge you to move beyond finding a middle ground in order to create a stronger New York City.

Respectfully submitted,


Linda Tigani on behalf of the Malcolm X Grassroots Movement

July 5, 2018

Honorable Analisa Torres
Daniel Patrick Moynihan
United States Courthouse
500 Pearl Street
New York, NY 10007-1312

RE: Remedies and community input in *Floyd, et al. v. City of New York, et al.*, Case No. 08-CV-1034 (AT)

Your Honor:

I am a lifelong Brooklyn resident, a Black man, and a member of the Malcolm X Grassroots Movement (MXGM), the community organization directly supporting named plaintiffs David Floyd and Lalit Clarkson in the above referenced case. Additionally, I was a plaintiff in *Daniels, et al. v. City of New York, et al.*, filed in 1999 charging the New York City Police Department (NYPD) with racial profiling policing tactics that led to the unjust killing of Amadou Diallo on February 4, 1999. Dating back to the early 1990's, I along with other MXGM members and the communities we represent across central Brooklyn have spent over two decades organizing to put an end to racist and deadly policing practices that result in the killing, beating, sexual assault and unlawful stops and arrests by NYPD.

I have spent over half of my life fighting for the right to breathe alongside my family, friends and community. As part of MXGM, I have worked to support the families of slain youth Timothy Stansbury, and Nicholas Heyward Jr., as well as Eric Garner among others. I believe that the police killings of Timothy Stansbury, Nicholas Heyward JR and Eric Garner are a result of abusive vertical patrols and trespass enforcement and/or began as level 1 investigatory encounters. Time and time again I have heard community members state that they feel a great sense of fear when an officer approaches them—often known as a level 1 stop- because they believe they may be brutally beaten or killed. This drives my work to help convene community town halls, protests, Know Your Rights and Cop Watch trainings touching over 10,000 people over the past two decades. In sequential Know Your Rights trainings, I have seen multiple generations of families in attendance who have said to me “the whole family needs this information, we are not trying to lose anyone.”

Families institutionalizing attending Know Your Rights workshops is one of the many signs that it is time to secure enforced mechanisms of accountability and transparency. We learned *Daniels, et al. v. City of New York, et al.*, lacked a mechanism to ensure community voice, transparency and accountability for all officers who continue to break the law abusing and killing community residents. The reforms that have been recommended by the Floyd Monitor have also failed to do this so far. Although the people demanded and won disbanding of the street crimes unit that killed Amadou Diallo in *Daniels, et al. v. City of New York, et al.*, not getting the remedies correct or enforced enabled the skyrocketing of unconstitutional stop-and-frisk. Through my work on *Daniels, et al. v. City of New York, et al.* I saw this firsthand that community forums and other remedies could not move forward because the NYPD refused to work in good faith with community members like myself to finalize and organize them. I believe this remedies process, our second lawsuit fought and won against NYPD, has a chance to correct error and create a definition and practice of community safety that includes communities and families of color.

As someone who has been unjustly stopped and frisked many times by the NYPD, and as someone who organized and participated in many rallies, press conferences, educational forums and other activities surrounding the ten week Floyd trial - I believe this is an opportunity to correct the injustice post *Daniels, et al. v. City of New York, et al.*, and bring about enforced and supported change in New York City. This would require that we respect the hard work of community members who invested in the court ordered remedial process and generated remedies that will decrease abusive policing and increase community safety. Furthermore, as advocates for justice organizing to support two lawsuits against racist and deadly policing practices, I am asking that we put an end to 20 years of lawsuits. We can do this by ensuring the remedies enacted in *Floyd, et al. v. City of New York, et al.*, put an end to, unjustified killing of youth and parents in order to rebuild a city that ensures Black and Brown communities are included in the definition and practice of community safety. I believe it is in the best interest of the law to create accountability that centers the lived realities of those directly impacted by unconstitutional and abusive policing.

In order to create a racially equitable New York City, we listened to youth, parents, and residents of central Brooklyn propose remedies they believe will make a difference. Along with our partners at Communities United for Police Reform, I want to uplift and support the following requests from the people most directly impacted by abusive policing.

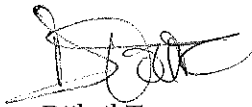
- **Zero Tolerance for Abusive Policing & Transparent Discipline:** Meaningful, timely and transparent discipline and accountability must be in place for officers and precincts/commands for unconstitutional abusive stops, and broader forms of police violence. Our constituents propose that discipline officers and precincts will face for such misconduct be made available to the public – and that community members should have a formal and structured way to give direct feedback on officers for the purpose of officer evaluations, and on their precincts.
- **Transparency for All Stops:** Stops begin with a level 1 interaction that may increase to a level 4 (arrest). Our constituents propose that NYPD be required to record and publicly report (quarterly and annually) all level 1 and level 2 encounters, disaggregated by demographic, geographic, and precinct/command information. The NYPD should be required to report them, rather than conceal the thousands of investigatory stops that New Yorkers are experience on their way to work, school, grocery store and picking up their kids from school – many of these encounters we believe are unconstitutional level 3 stops that are being mischaracterized as level 1 or level 2 encounters. As a result of repeated violence by NYPD, our constituents have repeatedly noted feeling concerned for the safety and not feeling able to invoke their right to walk away. Our constituents propose that officers should be required to notify people of their freedom to leave encounters that are not level 3 reasonable suspicion stops, which is permitted for level 1 and 2 stops. Officers should be required to identify themselves, explain the reason for the encounter, and provide their pre-typed business card in all level 1 encounters, just as they are required to in other encounters. This ensures that officers are not abusing their authority and conducting unconstitutional stops, or misreporting by not recording it as a stop.
- **Independent Community Board to Assess Compliance:** Create and resource an independent community board, consisting of at least 5-7 organizations that are led by, serve, and organize directly-impacted communities and police accountability groups with a significant history of work with the Floyd/Daniels/Ligon cases. We believe that an independent and resourced community board, which was discussed during a town hall facilitated by MXGM as per the court's order in the joint remedies

process, requires a community-led assessment of NYPD compliance that is based on the realities experienced by people most impacted by stop-and-frisk and trespass enforcement abuses.

The three core recommendations noted above and others in the CPR brief provide concrete actions that moves forward the human and civil rights of community members in police interactions. Additionally, these remedies work towards an end to physically, mentally, sexually abusive and deadly policing in New York City.

I urge you to move beyond finding a middle ground and exert judicial authority to include the hard work of communities in the remedies process, and create police accountability and transparency.

Respectfully submitted,

A handwritten signature in black ink, appearing to read 'Djibril Toure', with a stylized flourish at the end.

Djibril Toure

July 1, 2018

Honorable Analisa Torres
Daniel Patrick Moynihan
United States Courthouse
500 Pearl Street
New York, NY 10007-1312

Joint Remedial Process in *Floyd, et al. v. City of New York, et al.*, Case No. 08-CV-1034 (AT)

Your Honor:

I'm a native New Yorker and Puerto Rican who has lived my whole life in the Lower East Side of Manhattan in NYCHA's Lilian Wald Houses. I am a proud father and the owner of a small business called Inner City Movers. I have been a member of the Justice Committee since 2007.

As someone who has experienced unjust stops many times in my life and who fears for the safety of my son, I feel strongly that the outcome of the Floyd v. the City of New York Joint Remedies Process (JRP) must result in meaningful change for New Yorkers of color, who have suffered from the NYPD's abusive practices for decades. This is why I represented the Justice Committee on the JRP Advisory Committee for its duration. I agreed to be on the Advisory Committee because I wanted to help change how my community is treated by the NYPD. I also wanted to make sure my community of the Lower East Side had a voice in this process and that it was accountable to New Yorkers who are directly impacted by abusive policing.

I am submitting this statement because changes to the NYPD's practices of stopping New Yorkers, whether on the street or in buildings, are extremely important to everyday New Yorkers, like myself and people in my neighborhood. The reality is, we have not see changes on the ground, in the hood, the way the media and NYPD would have us believe has happened around the city.

This process has a personally meaning to me, because of the many unjust stops I have endured. I once had three plain clothes officers jumped out of a van, guns in hand, all pointed at me. They put one gun up against my right temple, one against the left side of my neck, and one directly against the center of my chest. I was told if I moved I would be shot. They proceeded to search my pockets without asking for my consent. After they found nothing in my pockets, they started stripping me of my clothing and left me there in broad daylight, standing in the snow, wearing nothing but my underwear and socks. After this humiliating experience was done, I wasn't ticketed. I wasn't arrested. They didn't apologize or give an explanation. There was no cause to stop me – or to abuse me in this way.

On other occasions, officers have put their hands down my pants and searched my genitals. I've had my head slammed against a car. I've been choked. I've had property taken out of my pockets and not returned. I've had my property intentionally broken without reimbursement. I've even

had my life threatened by the NYPD. I was never arrested on any of these occasions although I have been told, “you got lucky today.” The sad thing is, these were lucky days. I could easily have been arrested on trumped up charges, beaten or even killed, as has happened to so many other New Yorkers.

Now that I’m nearing my 40s I have less encounters with the police, but people throughout my building and in my neighborhood, especially the youth, still experience stops left and right, both in and outside of our buildings. My building and neighborhood are patrolled by PSA 4 and the 7th and 9th precincts, so we are stopped and harassed by three separate commands. The same people who are being stopped on foot are being stopped in cars. Officers are still doing sweeps of buildings, so if you’re visiting a friend and waiting in the hall for them to come to the door, you can easily get approached and questioned by the NYPD even though you have done nothing wrong.

It’s a real problem that data on most of these police encounters is not being collected or reported because NYPD officers are classifying them as level one or two stops. What they are are unconstitutional level 3 stops that don’t meet the “reasonable suspicion” standard. The vast majority of New Yorkers who are stopped don’t know the difference between level one, two and three stops and all of these encounters feel the same to us because you’re not free to leave, and sometimes we fear for our lives. For those of us who have been living with the NYPD’s stop-and-frisk practices as part of our daily lives for decades, one of the most important things that should come out of the JRP are real solutions to this. Without documentation, there is no proof of the constant harassment some of us face. While we know the abuse is still happening because we are living with it, those who are not directly impacted are unable to see the breadth of the problem and, as a result, the abuse continues. Much of this abuse starts with unconstitutional level 3 stops that are not being categorized that way. The court should order the NYPD to record information about the level one and two investigatory stops they make and to publicly report demographic information about who they are targeting and where these investigatory encounters are happening as well as information about which commands are doing these stops the most so that we have a real understanding of how the NYPD is actually still conducting regular unconstitutional stops that just aren’t being recorded.

On top of reporting requirements, the courts should order that the NYPD be transparent when officers do level one, two and three investigatory encounters. Specifically, NYPD officers should be required to inform New Yorkers when they have the right to leave a police encounter – like in level 1 and level 2 investigatory encounters. Since the NYPD is claiming they’re not making unconstitutional stops and that people are really free to leave level 1 and level 2 investigatory encounters, there should be no problem in letting people actually know that. This would help make sure that these level 1 and 2 encounters are really that – and not unconstitutional level 3 stops. Officers should be required to proactively identify themselves and explain why they’re stopping someone, whether it is a level one, two or three encounter.

Another important remedy the court should order is that there be real discipline for officers who make unconstitutional, abusive stops and trespass enforcement, whether they are on the street or in buildings. If officers don’t face real discipline when they violate our constitutional rights during stops and other encounters, there will be no change in behavior. Officers will continue to

break the law and violate rights because they know there will be no consequences. By “real discipline” I mean these measures need to have teeth. They need to actually impact officers’ ability to keep their jobs, receive promotions, and access their pensions. I believe that officers who make multiple unconstitutional stops are a threat to our safety and should be fired immediately. It’s as simple as that.

In order to develop disciplinary standards, the NYPD should be required to receive and actually take into account input from New Yorkers who have direct experience with unconstitutional stops. What this means is there has to be meaningful and accessible ways for people to share their input. It can’t be by a quick survey that no one knows about, as happened with the NYPD’s process for collecting feedback about their Body Worn Camera program. The court should also require the NYPD to be transparent about the discipline standards that get developed. These should be made easily accessible to New Yorkers through the NYPD’s website and this public posting should be updated anytime the NYPD makes changes to the standards.

Finally, affected New Yorkers like my son, my neighbors and me should have a real way to evaluate the NYPD’s compliance with constitutional policing and court-ordered reforms. We need a real way to be able to let the court know whether unconstitutional stops and trespass enforcement is continuing – which we know it is, regardless of what the NYPD and city officials might claim.

As we already saw during the JRP process, all too often, the people discussing and making decisions about policing have no experience as the targets of abusive policing or unconstitutional stops themselves. Although they may be good intentioned, they don’t have firsthand experience of the fear, humiliation and negativity caused by every unwarranted police encounter and unconstitutional stop or the impact contact with the criminal justice system can have on housing, education, employment and immigration status. They don’t know what it’s like to be living in a police state in their own neighborhoods. This severely limits their effectiveness in understanding what changes to police practice are needed and assessing whether these changes are actually taking place or not. That’s why the court should order the development of an independent community board that is empowered to provide the input of directly impacted people and communities about whether or not the NYPD is conducting constitutional stops and complying with court-ordered reforms. This board should consist of representatives of organizations working in and led by directly impacted New Yorkers that have a long-standing involvement in Floyd/Davis/Ligon and its predecessor case, *Daniels v the City of New York*. This board should be adequately resourced, including stipends for directly impacted members to participate in its meetings and work, and resources to assist our organizations in supporting our work and helping us gather feedback from community members.

The NYPD’s practice of unconstitutionally stopping New Yorkers on the street and in buildings has had devastating consequences, particularly for communities of color, for decades. This is why, in 2013, Judge Scheindlin ruled in favor of the Floyd, Davis and Ligon plaintiffs and ordered immediate reforms and the JRP. Thousands of directly impacted New Yorkers have invested in this process by participating in focus groups and town halls and/or as members of organizations that have been centrally involved in the JRP. Several, including me, have put in a considerable amount of time, thought and heart, representing our communities on the Advisory

Committee. It would be a tragedy and a disservice to the whole City if the JRP does not result in meaningful reforms that address failures in stop-and-frisk and related discipline, transparency and accountability directly. You have the opportunity to make a huge contribution to community safety and the protection of the rights of New Yorkers by ordering the reforms I've outlined in this statement and I hope you do.

Respectfully submitted,

A handwritten signature in black ink, appearing to read "Steve Kohut", with a long horizontal flourish extending to the right.

Steve Kohut